

FELLOWSHIP OF HOPE CHURCH

1618 SOUTH SIXTH STREET
ELKHART, IN 46516

(719) 294-1416

Attn: Tony Dzwonar
Director, External Affairs
Indiana Office of Utility Consumer Counselor
100 N. Senate Ave., Room N501
Indianapolis, IN 46204-2215

Date: November 7, 2004

Re: New Customer Service Rights & Responsibilities Rules [IURC Rulemaking No. 04-02]

From: Elders and Pastors, Fellowship of Hope Mennonite Church, 1618 South Sixth Street, Elkhart, IN 46516 [Barb Fridley, David Janzen, Verlin Miller, Joshua Yoder, Robert Weidman]

We write out of concern for low and moderate-income consumers, who are adversely affected by current regulations governing utility deposits. A neighbor of ours is currently without heat because she is unable to pay a deposit equaling four months of her annual bill. And sadly, her situation is anything but unique.

We find much to commend in the proposed Customer Service Rights & Responsibilities Rules [IURC Rulemaking No. 04-02], including:

- The provision in IAC 5-1.2-4(a) that when a deposit exceeds \$150, the consumer will have opportunity to make installment payments, and that service will be restored after the first such payment is made.
- The provisions in IAC 5-1.2-4 (f) regarding refunds of deposits.
- The provision in IAC 5-1.2-6 (f) that between December 1 and March 15, service will be restored upon payment of 20% of the amount past due and 20% of any deposit required.

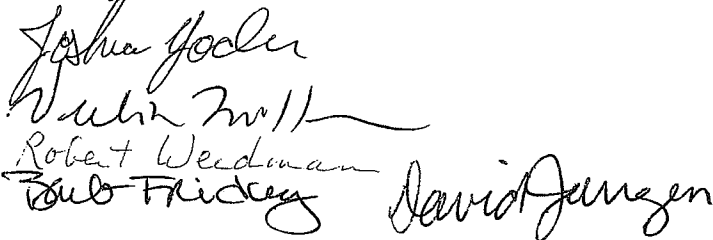
A member congregation of Mennonite Church USA



We oppose these changes:

- IAC 5-1.2-3(b) allows a utility to use a "predetermined minimum credit score" to determine whether a deposit will be required. We oppose the use of credit scoring, believing that use of credit scoring will disadvantage poor and minority consumers. A poor credit score does not necessarily reflect a person's ability to pay his or her utility bill. For example, a consumer with substantial unpaid medical bills might have a poor credit score, yet be quite able to maintain monthly utility payments.
- IAC 5-1.2-4(a) provides that deposits "shall not exceed one-sixth (1/6) of the estimated annual billings". We favor a maximum deposit of one-twelfth (1 month) of the annual bill. This would be comparable to security deposits required for rental housing.

Cordially



Joshua Yoder, Pastor

Robert Weidman, Pastor

Barb Fridley, David Janzen, Verlin Miller, Elders